notified. The Environmental Sciences Department shall then apply for the necessary approval.

IX. FORCE MAJEURE

The provisions of this Work Practice shall be subject to the doctrine of force majeure.

Revised: May 22. 1996

WORK PRACTICE PROCEDURE
SMELTER BAGHOUSE DUST UNLOADING
ASARCO - Omaha Plant

I. OBJECTIVE

The smelter baghouse (or north baghouse or baghouse #2) services the Residue Department. Prior to discharge, emissions from the Residue Department processes pass through the smelter baghouse where particulate matter is filtered and collected in one of four dust cellars (#1 - #4). Periodically, the collected dust must be removed from the cellars and transported to the Residue Department for storage prior to further processing. During unloading, fugitive dust emissions containing lead can often be created.

The objective of the following Work Practice Procedure is to minimize. control, and prevent the escape of fugitive dust emissions during the removal, transportation, and subsequent unloading of the smelter baghouse dust. This will be accomplished through the utilization of special equipment and the implementation of work practice procedures described below.

II. RESPONSIBILITY

The Environmental Services Department Supervisor shall be responsible for assuring that smelter baghouse dust unloading is conducted according to the stated procedure. Dust shall not be removed from the smelter baghouse without authorization from the Residue Department Supervisor or higher management. The Environmental Supervisor will also be responsible for procuring the required equipment and for training of hourly employees and contract employees. Training shall be conducted periodically as necessary and shall include all activities and procedures required by this Work Practice Procedure, as well as by safety and health policies and programs.

III. SUPERVISION AND ENFORCEMENT

On each shift that dust is unloaded from the smelter baghouse, the Environmental Services Department Supervisor shall be responsible for insuring compliance with the procedures described herein. These procedures will be strictly enforced. Failure to comply with the required

procedures may result in formal disciplinary action for the offending employee(s). Depending on the severity and frequency of the violation, the offending employee(s) will be disciplined by means of an oral or written warning, time-off without pay, transfer to an alternate job and/or employment termination.

IV. WEATHER CONDITIONS

The maximum average wind speed at which dust unloading may occur at the smelter baghouse is 15 mph. This is based on a 15 minute rolling average; i.e. after 15 minutes the average is updated every minute. No wind speed limitation applies when the cellar doors are closed and dust unloading occurs through the vacuum ports that are installed on each cellar door.

V. EQUIPMENT

A vacuum truck will be used to withdraw dust from the smelter baghouse cellars and to subsequently transport the dust to the Residue Department. This truck shall also be utilized to perform housekeeping activities both during, if necessary, and after completion of the unloading procedure. At a minimum, the vacuum truck shall be equipped with a totally enclosed hopper except the vacuum exhaust which shall be filtered by means of a baghouse prior to discharge.

On or before August 1, 1994, Asarco shall install vacuum ports in the cellar doors of the smelter baghouse. These ports shall be no larger than necessary to accept a sliding pipe through which baghouse dust can be vacuumed. When not in use, the ports shall remain closed.

On or before August 1, 1994, Asarco shall install windbreaks at the smelter baghouse. The windbreaks shall be at least 10 feet in height and gated to span the area between the flood wall and baghouse building on both the north and south sides of the baghouse. The windscreen/gate ends shall be equipped with rubber flaps to seal the space between the gate and flood wall. During unloading with the baghouse cellar doors open, these swinging windscreen/gates shall be closed, and, with the flood wall (west) and baghouse building (east), shall produce a completely surrounded unloading operation.

On or before August 1, 1994, Asarco shall install a new wind speed gauge located proximate to the smelter and softener baghouses. This gauge,

which shall be calibrated annually, shall be connected to a data logger which will record the 15 minute average wind speed. A visual and audio alarm shall be located at the smelter baghouse which will provide a warning once the 15 minute average wind speed reaches 14.9 mph. This will enable shut down procedures to commence prior to the 15 mph wind speed threshold being exceeded. The warning system will be activated and deactivated by a toggle switch located at the smelter baghouse. The data logger will continuously update the 15 minute average once a minute, even when the warning system is deactivated. When the system is activated, the wind speed data is saved for downloading, and, if the wind speed threshold was exceeded during the most recent 15 minute time period, the alarm will be triggered. This eliminates the need to wait 15 minutes before the cellar doors can be opened.

VI. UNLOADING PROCEDURES

The procedures described herein shall be utilized to perform smelter baghouse dust unloading. This operation will be conducted by a minimum of two employees - one vacuum truck operator and one baghouseman. The four smelter baghouse cellars shall be unloaded one at a time using the following procedures.

A. After positioning the vacuum truck near the cellar to be unloaded, the operator shall inspect and prepare the truck to assure proper operation, particularly the hopper seals and vacuum exhaust baghouse.

B. If any malfunction is detected prior to or during the course of unloading, the operation shall be immediately discontinued and shall not be resumed until the malfunction is corrected.

C. In the smelter baghosue control room, close the damper to the cellar to be unloaded and turn off the air supply to the damper controller. Follow all lockout/tagout procedures as outlined in the plant program.

D. Initially, the cellar shall be vacuumed through the ports on the cellar door. This shall continue until all of the fume that can be captured by vacuuming through the ports is removed.

E. Activate the wind speed recorder and alarm system by turning the toggle switch located at the smelter baghouse to the on position. If at any time during dust unloading the alarm system is triggered, proceed to Step Q.

F. The wind screen gates on both ends shall be closed, and, with the flood wall (west) and baghouse building (east), a completely surrounded unloading operation will be provided.

G Remove the sand from the bottom of the cellar doors.

H. Immediately vacuum any cellar dust that may spill out onto the unloading apron.

I. Vacuum the cellar dust starting from the front of the cellar and working back.

J. During vacuuming, the truck operator shall monitor the dust level in the truck to prevent overfilling.

K. Once the truck hopper is filled, the vacuum hose shall be emptied by aspirating with air and subsequently left in place.

L. The vacuum blower shall then be turned off and the vacuum hose disconnected from the truck.

M. Open the wind screen gate to allow removal of the truck from the enclosure and immediately close the gate.

N. After the truck has transported the dust to the enclosed Residue fume bin, the rear hopper door of the truck shall be unlatched and the dust slowly dumped into the bin by slowly tilting the hopper.

O. When empty, lower the hopper, relatch the hopper door, and sweep off any excess dust from the rear of the truck.

P. Repeat previous Steps A, B, F, and I - O until the baghouse cellar is empty.

Q. Upon completion or if the unloading operation is discontinued, remove the vacuum equipment from the cellar and thoroughly vacuum any dust visible on the unloading apron.

R. Close the cellar doors and deactivate the wind speed recorder by turning the toggle switch to the off position.

S. Reseal the door edges and replace the sand at the bottom of the cellar doors.

T. In the control room, open the damper of the cellar that was unloaded and open the air supply valve for the damper controller.

U. Empty all dust from the truck hopper as described above in Steps N and O.

V. After completion and prior to leaving the plant, the vacuum truck hopper, exterior, and undercarriage shall be thoroughly washed with high-pressure water, or vacuumed if inclement weather prevents washing.

W. The used vacuum hose shall always be stored at the plant.

X. If the wind speed data logger or warning system equipment malfunctions, baghouse unloading cannot be conducted with the cellar doors open until the equipment is repaired or until NDEQ approves an alternate unloading method.

VII. RECORDKEEPING

The Environmental Services Department Supervisor shall be responsible for maintaining a baghouse unloading inspection log. The log and wind speed data shall be retained by the Environmental Sciences Department for at least two years following the date recorded.

The Environmental Services Department Supervisor shall make an entry in the baghouse unloading inspection log (attached) during each shift that smelter baghouse unloading is conducted. Such entry shall include the day and date, time vacuuming started, whether vacuuming was only conducted through the vacuum ports, name of baghouse unloaded, times and duration the cellar doors were open, time vacuuming ceases, results of the inspection, name of inspector, and any other pertinent comments. If baghouse unloading is discontinued for any reason, the reason(s) why it was discontinued shall be logged.

For any shift in which the cellar doors were opened, the wind speed data from the data logger for the period in which the doors remained open shall be attached to the log. If vacuuming was conducted only through the vacuum ports, then wind speed data is not required and shall not be attached.

VIII. CHANGE IN PROCEDURE

All smelter baghouse unloading shall be conducted in accordance with the procedures described herein, unless written approval is first obtained from the NDEQ. If any deviations from these procedures become necessary, the Environmental Sciences Department shall be immediately notified. The Environmental Sciences Department shall then apply for the necessary approval.

IX. FORCE MAJEURE

The provisions of this Work Practice shall be subject to the doctrine of force majeure.

Revised: May 22, 1996

WORK PRACTICE PROCEDURE
STREET SWEEPING, APPLICATION OF DUST SUPPRESSANTS, AND STOCKPILE TARPING
ASARCO - Omaha Plant

I. OBJECTIVE

Land at the ASARCO - Omaha Plant that is not occupied by buildings or structures is comprised of areas which are either paved, graveled, or otherwise exposed. Most of these areas are subject to the deposition of process materials and airborne particulates. The entrainment of such materials and particulates can be induced by wind erosion and vehicular traffic, and thus fugitive lead emissions can be created. Fugitive lead emissions can also be created from outside storage piles of drosses, slags, and other lead-bearing materials which are subject to entrainment by wind erosion and handling.

The object of the following Work Practice Procedure is to minimize, control, and prevent the escape of fugitive lead emissions induced by wind erosion and vehicular traffic. This shall be accomplished through the utilization of special equipment and the implementation of Work Practice Procedures described below.

II. RESPONSIBILITY

The Services Department Supervisor shall be responsible for assuring that street sweeping, dust suppressant applications, and stockpile tarping are conducted according to the stated procedure. The supervisor shall also be responsible for procuring the necessary dust suppressants and tarps, maintaining the required equipment, and for training of applicable employees. Training shall be conducted periodically as necessary and shall include all activities, procedures, and frequencies required by this Work Practice Procedure, as well as by safety and health considerations.

III. SUPERVISION AND ENFORCEMENT

At least once per week, the Environmental Engineer or Services Department Supervisor shall inspect all outside stockpiles, paved areas, graveled areas, and otherwise exposed areas for compliance with the procedures described herein. All procedures described herein shall be strictly enforced. Failure to comply with these procedures may result in

formal disciplinary action for the offending employee(s). Depending on the severity and frequency of the violation, the offending employee(s) shall be disciplined by means of an oral or written warning, time-off without pay, transfer to an alternate job and/or employment termination.

IV. SUSPENSION OF PROCEDURE

A. Adverse Weather

The procedures described herein may be suspended during the period of November 1 to April 1, and during any other period when the temperature is less than 35°F. In addition, the application of dust suppressants shall be suspended during precipitation.

B. Equipment Maintenance and Repair

Street sweeping and dust suppressant applications may also be suspended during those periods necessary to perform maintenance and repairs of equipment essential to the respective activity. Any maintenance and repair work shall be completed as soon as possible, and upon completion, the respective activity shall be immediately resumed in accordance with the stated procedure.

C. Suspension of Production Operations

In the event that all production operations, with the exception of the Antimony Oxide Department, are suspended and shut down, street sweeping and dust suppressant applications may be suspended for the duration of such period.

V. EQUIPMENT AND MATERIALS

A. Street Sweeping

Street sweeping shall be conducted with a regenerative air or vacuum type sweeper. Air discharged from a vacuum type sweeper shall be filtered by a baghouse or equivalent before discharge, while no air is discharged from a regenerative air type sweeper.

B. Dust Suppressants

A mobile spray truck shall be used to apply dust suppressants to stockpiles and unpaved areas. The spray truck shall be equipped with two or more storage tanks, spray hose(s), spray nozzle(s), and high pressure spray pump(s). With this equipment, lignosulfonate, or equivalent, shall be applied to unpaved areas (both graveled and otherwise exposed), while a mixture of lignosulfonate and a water-insoluble latex binder, or equivalent, shall be applied to stockpiles that are not tarped and to the exposed surfaces of stockpiles that are partially tarped.

C. Stockpile Tarps

In lieu of applying dust suppressant to stockpiles, they may be tarped. These tarps shall be fabricated from plastic, nylon, canvas, or a combination. The tarping material must be able to withstand temperature extremes.

VI. PROCEDURES

The procedures described below shall be utilized to conduct street sweeping, dust suppressant applications, and stockpile tarp placement.

A. Street Sweeping

1. At the beginning of each day, the sweeper truck operator shall inspect and prepare the sweeper to assure proper operation. In particular and if applicable, the dust hopper, hopper seals, water tanks, spray nozzles, pick-up head flaps, and filtration system shall be inspected.

2. If any sweeper truck malfunction is detected prior to or during the course of sweeping, the operation shall be immediately discontinued and shall not be resumed until the malfunction is corrected.

3. Under normal circumstances, street sweeping shall be conducted for at least six hours each day, except Sundays and holidays. Access permitting, all paved areas shall be subject to street sweeping with emphasis on those areas subject to heavy dust accumulations and vehicular traffic.

4. When the sweeper hopper is filled, wet sweepings shall be unloaded into the equipment wash facility, while dry sweepings shall be dumped inside the enclosed Residue fume bin. In both cases, the hopper seals shall be inspected and cleaned, if necessary, before resealing the hopper door(s).

B. Dust Suppressants

1. Unpaved Areas

A dust suppressant shall be applied at least once every 14 days to all unpaved areas, both graveled and otherwise exposed. In the event a water soluble dust suppressant is utilized, dust suppressant applications shall also be repeated following the cumulative measurement of rainfall totaling 0.25 inches or greater. In such cases, the dust suppressant shall be applied as soon as possible after the surface has dried, except that dust suppressants need not be applied on Saturdays, Sundays, and holidays. The magnitude of rainfall shall be determined by an on-site rain gauge operated by the Environmental Sciences Department. Rainfall measurements and surface dryness assessments shall be conducted each day except Saturdays, Sundays, and holidays.

2. Stockpiles

A dust suppressant shall be applied to the surface of all untarped outside stockpiles of drosses, skims, slags (except softener skim bin) and refractory bricks. All such piles shall be inspected each day, excluding Saturdays, Sundays, and holidays, to determine the need for dust suppressant applications. Based on these inspections, a dust suppressant shall be applied as soon as possible after the surface of the pile(s) has dried and following stockpile creation, addition, subtraction, and as otherwise necessary to maintain a surface seal.

C. Stockpile Tarps

1. Tarps may be used to cover outside stockpiles of drosses, skims, slags (except the softener skim bin), and refractory bricks. These tarps shall be of sufficient size to cover the entire stockpile and be secured to prevent it from blowing off. If the tarp does not cover the entire stockpile, the exposed surfaces will be sprayed with dust suppressants. Prior to adding to or removing material from the stockpile, the tarp shall be pulled back to expose the stockpiled material. Once the material transfer is complete, the tarp shall be pulled back into place and secured. If material that has been added to a stockpile is still hot, the tarp shall not be replaced until the material cools. This shall be noted in the comments section of the tarping log.

VII. RECORDKEEPING

The Environmental Sciences Department shall be responsible for maintaining and retaining the following records. Such records shall be retained for at least two years following the date recorded.

A. Street Sweeping Log

The operator, Environmental Engineer, or Services Department Supervisor shall make an entry in the street sweeping log (attached) each day, excluding Sundays and holidays, except that no entry need be made during the period November 1 through April 1 unless street sweeping is conducted. Each entry shall include the date, starting and ending times (disregarding coffee and lunch periods), type of sweeper operated, name of person reporting, and any pertinent comments. In the event sweeping was not conducted for at least six hours per day, the specific reason(s) why it was not must be recorded along with any corrective action(s).

B. Dust Suppressant Log

The spray truck operator, Environmental Engineer, or Services Department Supervisor shall make an entry in the dust suppressant log (attached) each day, excluding Saturdays, Sundays, and holidays, except that no entry need be made during the period November 1 through April 1 unless dust suppressants are applied.

Each entry shall include the date; rainfall measurement, and name of person reporting. When dust suppressant inspections are conducted, the entry shall also include the time of inspections, surface condition of unpaved areas (e.g. wet, damp, dusty, sealed, etc.), whether the stockpiles require resealing, and any other pertinent comments. On each occasion that dust suppressants are applied, the type(s) utilized (e.g. ligno, ligno/latex, etc.), total amount applied, and any pertinent comments shall be recorded. In the event that dust suppressant inspections or applications are not conducted at the required frequency, the specific reason(s) why must be recorded along with any corrective action(s).

C. Stockpile Tarping Log

The front-end loader operator, Environmental Engineer, Services Department Supervisor, or Residue Department Supervisor shall make an entry in the stockpile tarping log each day, excluding Saturdays, Sundays and holidays. Each entry shall include the date, stockpiled material that is tarped, time the tarp was removed, time the tarp was replaced, the reason why the tarp was not replaced, and the tarp condition.

VIII. CHANGE IN PROCEDURE

All street sweeping dust suppressant applications and stockpile tarping shall be conducted in accordance with the procedures described herein, unless written approval is first obtained from the NDEQ. If any deviations from these procedures become necessary, the Environmental Sciences Department shall be immediately notified. The Department shall then apply for the necessary approval.

IX. FORCE MAJEURE

The provisions of this Work Practice shall be subject to the doctrine of force majeure.

Revised: May 22, 1996

Asarco Order

STREET SWEEPING LOG
ASARCO - Omaha Plant

Date	OPERATING TIMES		TYPE OPERATED		Comments or reason(s) why not conducted at least six hours	Reported By:
	Start	Finish	Johnston	Tennant		

ASARC Omaha Plant

Date	Rainfall (inches)	INSPECTION RESULTS			APPLICATIONS		Comments or reason(s) why inspection or application not conducted including corrective action	Reported By:
		Time	Unpaved Areas Surface Condition	Stockpiles Resealing Required?	Type(s) Applied (ligno or ligno/latex)	Total Amount Applied (gallons)		

Asarco Order

OMAHA SPILL PREVENTION PLAN TO MINIMIZE LEAD EMISSIONS

1.0 GENERAL

1.1 This work practice program is designed to minimize lead emissions that could occur from spills that may occur as a result of transporting lead bearing materials from one location to another within the Plant.

1.2 A spill is the abnormal accumulation of any lead bearing material that results from normal activities of transporting or movement of materials outside (not within buildings and covered structures), which continue to cause lead emissions.

1.3 The work program covers two types of activities that may result in spillage of lead bearing materials, namely work related to transporting material on unpaved surfaces, and transporting material on paved surfaces.

2.0 SPILLS THAT OCCUR ON UNPAVED SURFACES

2.1 Whenever a spill occurs on an unpaved surface within the Plant, the spilled material shall be cleaned up as soon as practicable by the employee who caused the spill. At times, a spill may occur that was not noticed by the employee transporting the material. In this situation, once the spill is discovered, it shall be cleaned up as soon as practicable but in no case greater than 32 hours later by Services Department personnel or other personnel assigned by the Residue Department Supervisor. Once the spill is cleaned up, limerock or some other non-lead bearing material shall be placed over the spill site.

3.0 SPILLS THAT OCCUR ON PAVED SURFACES

3.1 Whenever a spill occurs on a paved surface within the Plant, the spilled material shall be cleaned up as soon as practicable by the employee who caused the spill. At times, a spill may occur that was not noticed by the employee transporting the material. In this situation, once the spill is discovered, it shall be cleaned up as soon as practicable but in no case greater than 32 hours later by the Services Department personnel or other personnel assigned by the Residue Department Supervisor. The Services Department will vacuum the area of the spill with the street sweeper, weather permitting, according to the regular street sweeping schedule.

OMAHA DUST CONTROL PLAN FOR CONSTRUCTION PROJECTS

1.0 GENERAL

1.1 At all times during the contract work, the Contractor shall provide methods and equipment for controlling and suppressing dust resulting from his work. If the work is completed by ASARCO, then the plant shall follow this program.

1.2 The procedures outlined herein are to be considered as minimum requirements in the Contractor's dust control plan. The Contractor shall amplify or supplement these procedures, or develop alternate procedures, as required by the specific site conditions and/or the Contractor's construction methods. Such revised or alternate procedures shall be submitted to ASARCO.

1.3 Prior to commencement of on-site work, the Contractor shall submit to ASARCO a detailed, written plan of the methods and equipment for dust control that the Contractor plans to use.

2.0 PRE-CONSTRUCTION CLEANING

Prior to commencement of construction, the Contractor shall or ASARCO will complete the following preparatory work to eliminate or minimize dust emissions during construction. ASARCO will decide if this work is to be done by a contractor or by ASARCO.

2.1 Clear and clean up the construction areas to the maximum extent practicable.

2.2 Remove settled metallurgical dust from surfaces that will be affected by construction activities.

2.2.1 Affected surfaces may include: area grades, whether paved or unpaved; floors, decks, walkways; building structures, including curbs, foundations, beams, columns, trusses; piping and conduit runs; and machinery and equipment, including pedestals. Such surfaces may be adjacent to, as well as within, the main constructions areas.

2.2.2 Settled dust shall be removed from surfaces by vacuum cleaning. High-pressure water washdown methods may supplement vacuum

cleaning as required (e.g. in inaccessible areas).

2.3 Transport and deposit collected dust at designated places within the plant.

3.0 DUST CONTROL

3.1 The Contractor shall thoroughly moisten dry soils and excavated materials during excavation, loading, transporting, dumping, backfilling, grading or other earthmoving activities. Moisturizing shall be applied to exposed and disturbed surfaces of cuts, openings, fills, embankments and stockpiles during these activities. Moisturizing shall be applied continuously or as necessary to essentially eliminate or minimize dust emissions.

3.2 To achieve dust control with minimum water usage, low-volume, high-pressure water fogging nozzles with adjustable water application rates should be considered.

3.3 In addition to moisturizing techniques, and when feasible and necessary for dust control, the Contractor shall isolate dust-generating activities with temporary screens and enclosures.

3.4 The Contractor shall maintain his traffic areas in a wetted-down condition or provide roadway sweeping during construction activities, to the extent possible, in order to minimize dust emissions.

3.5 When transporting excavated or dust-ladened materials, the Contractor shall minimize spillage and wind dispersal of dust. In addition to properly moisturizing the materials, the Contractor shall adequately cover materials, if necessary, during transporting. Spillages shall be cleaned up immediately.

3.6 During nonworking periods, including weekends and holidays, the Contractor shall furnish, install, maintain and secure suitable and adequate means to prevent wind dispersal of dust from cut, opened, exposed or disturbed surfaces of stockpiles and earthwork activities. For material containing ≥ 1.0% lead the material shall be contained with concrete highway barriers at a location selected by the plant Environmental Engineer, and the contained material shall be subject to the provisions of ASARCO's dust suppressant program for stockpiles.

3.7 Should the Contractor's vehicles or equipment be operated in areas containing metallurgical dust, or be used in handling such dust, the vehicles or equipment must be cleaned prior to moving off site. At a minimum, wheels, undercarriages and any parts of the equipment (e.g. truck beds, loader buckets) that come in contact with metallurgical dust shall be washed down at a designated on-site truck wash station.

In addition, the Contractor shall clean his vehicles and equipment as often as necessary during the contract work to minimize tracking, spreading, and dispersing metallurgical dust in or beyond the construction areas.

EPA Rulemakings

CFR: 40 C.F.R. 52.1420(c)(45)(i)(A)

FRM: 62 FR 13329 (3/20/97)

PRM: 61 FR 64304 (12/4/96)

State Submission: 8/26/96

State Proposal: 4/11/96

State Final: 6/6/96

APDB File: NE-27

Description: EPA approved Amended Complaint and Compliance Order Case No. 1520 and accompanying work practice manual in Appendix A. This order replaces Administrative Order 753.

Note: All previous versions of the order are obsolete; the record of prior rulemakings is shown below for historical purposes only.

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CFR: 40 C.F.R. 52.1420(c)(35)

FRM: 52 FR 28694 (8/3/87)

PRM: 52 FR 5554 (2/25/87)

State Submission: 2/2/87

State Proposal: 9/27/85 (10/21/85); 9/30/86

State Final: 8/22/85; 5/9/86; 11/12/86

APDB File: NE-13

Description: EPA approved Administrative Order No. 753 (8/22/85) as amended on May 9, 1986, and November 12, 1986, issued by the state to Asarco, Inc. in conjunction with a revised lead attainment demonstration.

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CFR: 40 C.F.R. 52.1420(c)(30)

FRM: 50 FR 4510 (1/31/85)

PRM: 48 FR 57323 (12/29/83); 49 FR 24149 (6/12/84)

State Submission: 8/1/84

State Proposal: 6/4/84

State Final: 6/12/84

APDB File: NE-13

Description: EPA approved an administrative order issued by the state to Asarco, Inc. in conjunction with the Omaha lead SIP, but withheld action on whether the overall control measures in the order were adequate to assure attainment.

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Difference Between the State and EPA-Approved Regulation

EPA did not approve paragraph 19 of Amended Complaint and Compliance Order Case No. 1520.